

LSK&D #: 266-2014 / 4829-3638-8831
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JAMIE HODGES and ON THE MOVE LTD.,

Plaintiffs,

-against-

JAMES EARLY, IRISH DANCING TEACHERS
ASSOCIATION OF NORTH AMERICA-MID-
ATLANTIC REGION, INC., MOLLY
KATHLEEN LUTWIN, FRANCIS ACADEMY
OF IRISH DANCE, and KEITH L. LABIS,

Defendants.

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1:20-cv-09878-ALC

**NOTICE OF MOTION TO
DISMISS**

PLEASE TAKE NOTICE, that upon the declaration of Thomas A. Catalano, dated March 8, 2021, the memorandum of law in support of the motion, and the complaint, the Defendant Molly Kathleen Lutwin, doing business as the Francis Academy of Irish Dance, sued herein as Molly Kathleen Lutwin and Francis Academy Of Irish Dance (“Lutwin”), will move this court, before the Honorable Andrew L. Carter, at the United States Courthouse, 40 Foley Square, New York, NY 10007, on a date to set by the court, for an order pursuant to Rule 12(b)(6) of Federal Rules of Civil Procedure granting defendant Lutwin’s motion to dismiss the complaint with prejudice on the grounds that it fails to state a cause of action upon which relief may be granted.

Dated: New York, New York
 March 8, 2021

Respectfully submitted,

LESTER SCHWAB KATZ & DWYER, LLP

s/ Thomas A. Catalano

Thomas A. Catalano
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Dance, sued herein as Molly Kathleen Lutwin and
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